

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-10787
Amateur Service Rules to Eliminate)	
Morse Code Testing)	
)	
To: The Commission		

COMMENTS TO THE PETITION

I concur with the above petition (“the Petition”) filed by the National Conference of Volunteer Examiner Coordinators (“NCVEC”) in all respects.

I was originally licensed in 1986 after a career in the United States Air Force that did not permit me the time to learn the Morse code. Since that time I have acquired the then necessary code skills (20 WPM) to be granted an Amateur Extra Class license. I work in a high technology environment (International Space Station sustaining engineering) and have had numerous fellow high technology co-workers express an interest in becoming a licensed Amateur, but lose interest when the still extant code requirement is explained to them. They have no interest in learning a skill perceived as too difficult to learn when they perceive its utility is so low. I’m sure that Morse code operation will continue into the foreseeable future as many Amateurs enjoy the mode and future Amateurs will as well. It makes no sense to require that all Amateurs demonstrate proficiency in what is now just one of many modes, regardless of the history of that mode.

BACKGROUND

Why was a telegraphy skill requirement for an Amateur Radio operator license needed at all?

In the early days of radio, every radio station, regardless of its purpose or service, used “spark” transmitters. Spark generated signals are very wasteful of spectrum space, and interference between users is difficult or impossible to avoid. The original basis of the requirement for an Amateur licensee to demonstrate skill in sending and receiving Morse code signals was to insure that the Amateurs could understand instructions to stand by or cease operating if they were interfering with important communications from government or military stations.

This code proficiency requirement resulted in their being a “pool” of operators trained in the use of manual telegraphy in the event of war. These individuals were of prime interest to the military for many years. During both WW1 and WW2, Amateur radio operators were sought by the military for these communications skills. Today the military has no interest.

THE SITUATION TODAY

Morse code skills are no longer required for either of the original reasons.

The primary reason for insuring that Amateur Radio operators could understand and reply using Morse code has disappeared. Spark transmission is prohibited in all radio services because of its interference creating characteristics. Modern radio systems are sufficiently capable of rejecting interfering signals, so much so that mutual interference is a non-issue. The uses of narrow band signals, multiple modulation techniques, improved engineering practice, and modern spectrum management have made the issue obsolete.

Non-Amateur Radio Service use of Morse code has declined or completely disappeared. While our military still uses some specially trained “intercept operators” to gather intelligence from Morse code signals of other countries, the use of Morse by our own forces has ceased. Modern signal encryption and data processing techniques, together with the type, bandwidth requirements and quantity of information being transmitted make the use of Morse code inadequate for the task. Therefore, its use has ceased. The same situation is true for other government and commercial users. No service has a present requirement for, or interest in, the use of Morse code except for the Amateur Radio Service.

Morse code skills do not make a “better” Amateur Radio operator.

Morse code testing was removed as a requirement for the Technician class Amateur Radio license quite a few years ago. There has been no indication of an increase in illegal activities on the Amateur bands at VHF and higher frequencies. The percentage of illegal and questionable operations by Amateur Radio licensees, code free license or not, while regrettably not zero, remains very small, according to comments by Riley Hollingsworth of the FCC’s enforcement division. There is no reason to expect that granting of code-free licenses for HF access would result in an increase in illegal operation or be in any way different from the VHF experience.

SUMMARY

I favor terminating the telegraphy skill requirement for all classes of Amateur Radio licenses, including the removal of Element 1, as defined in sections § 97.501(a) and (b) of the Commission’s rules. I also favor an immediate end to testing for Morse code skills, as defined in section §97.503(a) of the Commission’s Rules. I also favor the immediate granting of “Technician Plus” privileges to all existing Technician class Amateur Radio licensees.

Respectfully submitted,

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